

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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**In re:**

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**Chapter 13**

**JAMES ALLOTTA,**

**Case No. 5:23-bk-02873-MJC**

**Debtor.**

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**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that the attorneys set forth below hereby appear as counsel for Obermayer Rebmann Maxwell & Hippel LLP (“Obermayer”), and pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned requests that an entry be made on the Clerk’s Service List in the above captioned case, and that all notices given or required to be given and all papers served or required to be served in this case be given to and served upon:

Michael D. Vagnoni, Esquire  
OBERMAYER REBMAN MAXWELL & HIPPEL LLP  
Centre Square West, Suite 3400  
1500 Market Street  
Philadelphia, PA 19102  
michael.vagnoni@obermayer.com  
(215) 665-3066 – Telephone  
(215) 665-3165 – Facsimile

**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, statements of affairs, operating reports, schedules of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier services, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (a) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in this case, with

respect to (a) the debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by the undersigned.

**PLEASE TAKE FURTHER NOTICE** that Obermayer does not intend for this entry of appearance or any later appearance, pleading, claim, or suit to constitute a waiver of (1) the right of Obermayer to have final orders in non-core matters entered only after de novo review by the District Court, (2) the right of Obermayer to a trial by jury in any proceeding so triable in this case or in any case, controversy or proceeding related to this case, (3) the right of Obermayer to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other right, claim, action, defense, set off or recoupment to which Obermayer is or may be entitled.

Respectfully submitted,

Dated: May 31, 2024

By: /s/ Michael D. Vagnoni  
Michael D. Vagnoni, Esquire  
OBERMAYER REBMANN MAXWELL & HIPPEL LLP  
Centre Square West, Suite 3400  
1500 Market Street  
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215-665-3066 – Telephone  
215-665-3165 – Facsimile  
*Counsel to Obermayer Rebmann Maxwell & Hippel LLP*

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**CERTIFICATE OF SERVICE**

I, Michael D. Vagnoni, Esquire, attorney for Obermayer Rebmann Maxwell & Hippel LLP, hereby certify that on May 31, 2024, a true and correct copy of the Notice of Appearance and Request for Service of Papers in the above captioned case was served electronically via the Court's CM/ECF system or First Class U.S. Mail upon the attached service list.

/s/ Michael D. Vagnoni  
Michael D. Vagnoni, Esquire

## **SERVICE LIST**

Patrick James Best, Esquire on behalf of Debtor James Allotta  
[patrick@armlawyers.com](mailto:patrick@armlawyers.com)

Office of the United States Trustee  
[ustpreion03.ha.ecf@usdoj.gov](mailto:ustpreion03.ha.ecf@usdoj.gov)

Jack N. Zaharopoulos, Standing Chapter 13 Trustee  
[info@pamd13trustee.com](mailto:info@pamd13trustee.com)